

In the Notice of Inquiry in the matter of Broadcast Localism, the commissioners asked for public input on how broadcasters were serving the needs of their communities, and what policies, practices or rules should be enacted in order to promote localism in broadcast.

In the introduction, it was stated that deregulation was a result of the belief that market forces would encourage broadcasters to serve the public interest. I would like to point out that when broadcasters merge into large national broadcasting companies, smaller, local broadcasters with fewer contacts and resources can not necessarily compete, regardless of the popularity or responsiveness to local needs that they may have in their community.

Large broadcasting companies have business advantages in available capital, centralized management, corporate ties to advertisers, record companies and other media outlets. These advantages make them more competitive, and at the same time encourage a centralized approach to broadcasting and content that is counter-productive to localization.

Smaller broadcasters, who may very well be more involved and responsive to the local community and its needs, can't compete with large corporations on a business level and therefore may not prosper in a marketplace in which they must compete with large broadcasters leveraging their larger resources. In this case, it is a business problem in which the market forces favor, not those who serve the public interest best, but those who can operate and provide content the cheapest.

In many cases, large broadcast companies are motivated primarily by the profits they can make using the airwaves belonging to the public, and not by ways to serve the public and local communities. Extensive local coverage of news and political issues, and researching and implementing ways to serve the public interest are not necessarily profitable, and therefore are not priorities to companies whose loyalty is to stockholders, not to the public. Without regulation requiring them to serve the local community and ways for the FCC to review and hold them accountable for those responsibilities, it is unlikely that they will take any more than the minimum of efforts to fulfill their duties to the public. These minimums should be raised to ensure that broadcasters will have to put the local community's needs before their own financial interests: stockholders will hold them accountable for profits, the FCC should hold them accountable for service.

At this time, scarcity still warrants agency intervention with broadcast companies on behalf of the public interest. These airwaves belong to the public and should be used for the public good. A return to rules held previously by the FCC is called for. Tightening ownership regulations, re-introducing the accountability provided by ascertainment requirements, and a shorter license length would reduce the unfair competition of large broadcast companies and require all broadcast companies to better meet the needs of their communities.